

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)	
Plaintiff,)	Honorable Aleta A. Trauger
vs.)	PLAINTIFF’S MOTION TO PRECLUDE
CORRECTIONS CORPORATION OF)	DEFENDANTS FROM RELYING ON AN
AMERICA, et al.,)	ADVICE OF COUNSEL DEFENSE
Defendants.)	
_____)	

PLEASE TAKE NOTICE that, pursuant to this Court's July 9, 2020 Order (ECF No. 238) and Federal Rules of Civil Procedure 33 and 37, Lead Plaintiff and Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund ("Plaintiff"), on behalf of itself and the class of investors who purchased CCA¹ securities between February 27, 2012 and August 17, 2016, inclusive, respectfully moves this Court for an order precluding all Defendants from asserting any claim or defense, or introducing evidence or testimony, or eliciting testimony from any witness, that any Defendant received, considered or relied on the advice of counsel. This Motion is based on the concurrently filed Memorandum of Law in support thereof, the Declaration of Christopher M. Wood in support thereof and exhibits thereto and such other evidence and argument as the Court may consider.

DATED: August 10, 2020

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¹ "Defendants" are Corrections Corporation of America ("CCA" and certain of its executives. Following the filing of this action, Defendants rebranded CCA and now refer to it as CoreCivic.

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on August 10, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

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Manual Notice List

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